

1 Joshua A. Dowling, Esq.
Nevada Bar No. 12956
2 William T. Sykes, Esq.
Nevada Bar No. 009916
3 CLAGGETT & SYKES LAW FIRM
4101 Meadows Lane, Ste. 100
4 Las Vegas, Nevada 89107
(702) 655-2346 – Telephone
5 (702) 655-3763 – Facsimile
Email: josh@claggettlaw.com;
6 wsykes@claggettlaw.com

7 *Pro Bono Counsel for Plaintiff*
8 *George Brass*

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 GEORGE BRASS,

12 Plaintiff,

13 v.

14 CHARLES DANIELS, director of Nevada
Department of Corrections;
15 MICHAEL MINEV, an individual;
GREGORY BRYAN, an individual;
16 WILSON BERNALES, an individual;
DAVID RIVAS, an individual;
17 BENEDICTO GUTIERREZ, an individual;
RIO MANALANG, an individual;
18 GREGORY MARTIN, an individual;
JAYMIE CABRERA, an individual;
19 NONILON PERET, an individual;
NICHOLAS PARSONS, an individual;
DOES I-X, inclusive; collectively,

20 Defendants.

Case No. 2:21-cv-00074-RFB-MDC

**STIPULATION FOR LEAVE
TO AMEND COMPLAINT**

21
22 IT IS HEREBY STIPULATED by and between Plaintiff, GEORGE BRASS,
23 by and through his attorneys of record, CLAGGETT & SYKES LAW FIRM, and
24

Defendants CHARLES DANIELS, et al., by and through their attorney of record, Chris W. Davis, Esq., that Plaintiff be allowed to amend the Complaint to clarify Plaintiffs allegations and to ensure clarity and uniformity in the case going forward.

Pursuant to Fed. R. Civ. P. 15(a), Defendants hereby consent in writing to allow Plaintiff to Amend the Complaint to clarify Plaintiff's allegations and ensure clarity and uniformity in the case going forward.

IT IS SO STIPULATED

Dated this 4 th day of April, 2024	Dated this 4 th day of April, 2024
Claggett & Sykes Law Firm	State of Nevada - Office of the Attorney General
<u>/s/ Joshua A Dowling</u> Joshua A. Dowling, Esq. Nevada Bar No. 12956 4101 Meadows Lane, Ste. 100 Las Vegas, Nevada 89107 (702) 655-2346 – Telephone (702) 655-3763 – Facsimile Email:josh@claggettlaw.com;	<u>/s/ Chris Davis</u> Chris Davis, Esq. Bar No. 6616 555 East Washington Ave., Suite 3900 Las Vegas, Nevada 89101 T: (702) 486-9252 F: (702) 486-3773 E: cwdavis@ag.nv.gov
<i>Pro Bono Counsel for Plaintiff</i>	<i>Attorney for Defendants</i>

IT IS SO ORDERED

United State Magistrate

Judge Dated: 4/9/24

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT on the 4th day of April, 2024, I caused to be served a true and correct copy of the foregoing **STIPULATION FOR LEAVE TO AMEND COMPLAINT** on the following person(s) by the following method(s) pursuant to FED. R. CIV.P. 68;

Via E-Service and USPS Mail:

George Brass, #1045449
High Desert State Prison
P.O. Box 650
Indian Springs, Nevada 89070
E: HDSP_LawLibrary@doc.nv.gov
Plaintiff

Via E-Service:

AARON D. FORD
Attorney General
CHRIS DAVIS (Bar No. 6616)
Senior Deputy Attorney General
State of Nevada - Office of the Attorney General
555 East Washington Ave., Suite 3900
Las Vegas, Nevada 89101
T: (702) 486-9252
F: (702) 486-3773
E: cwdavis@ag.nv.gov
Attorney for Defendants
Wilson Bernales, Gregory Bryan,
Jaymie Cabrera, Charles Daniels,
Benedicto Gutierrez, Rio Manalang,
Gregory Martin, Michael Minev,
Nicholas Parsons, Nonilon Peret, and David Rivas

/s/ Mary J. Pinkerton

An Employee of
CLAGGETT & SYKES LAW FIRM